	Case 1:07-cv-08324-JSR Docum	nent 18-1	3 Filed 06/04/2008 Page 1 of 6 3
,	; ** 1	2	
	UNITED STATES DISTRICT COURT	3	STIPULATIONS
	SOUTHERN DISTRICT OF NEW YORK		
	x	4	IT IS HEREBY STIPULATED AND AGREED
	WINNIFRIED NOEL CHARLES,	5	
	Plaintiff,	6	by and between the attorneys for the
	-against-	7	respective parties herein, that filing,
	MICHAEL CHERTOFF, Secretary of the Department of Homeland Security, in his official capacity,	8	sealing and certification be and the
	ENRICA TROY, MARY ANN GANTNER, and THE DEPARTMENT OF HOMELAND SECURITY,	9	same are hereby waived.
	Defendants.	10	
	x	11	IT IS FURTHER STIPULATED AND AGREED
	86 Chambers Street New York, New York	12	that all objections, except as to the
	April 10, 2008	13	form of the question shall be reserved
	11:21 a.m.		to the time of the trial.
	DEPOSITION of ENRICA M. TROY, a	14	to the time of the that.
	Defendant in the above-entitled action, held at	15	
	the above time and place, pursuant to Notice,	16	IT IS FURTHER STIPULATED AND AGREED
	taken before Caryn R. Miller, a shorthand	17	that the within deposition may be signed
	reporter and Notary Public within and for the	18	and sworn to before any officer
,	State of New York. LEX #66866	19	authorized to administer an oath, with
		20	the same force and effect as if signed
		21	and sworn to before the Court.
		22	
		23	
		24	
		25	
	2	25	4
1	Appearances:		ENRICA M. TROY, the witness herein,
3		1	
4	MICHAEL P. MANGAN, LLC Attorneys for Plaintiff	3	having first been duly sworn by a
5	80 Wall Street, Suite 1214	4	Notary Public of the State of New York,
	New York, New York 10005	5	was examined and testified as follows:
6	BY: MICHAEL MANGAN, ESQ.	6	EXAMINATION BY
7		7	MR. MANGAN:
'		8	Q Please state your name for the
8		9	record.
9	U.S. DEPARTMENT OF JUSTICE	10	A Enrica M. Troy.
	U.S. ATTORNEY'S OFFICE,	11	Q Please state your address for the
10	SOUTHERN DISTRICT OF NEW YORK 86 Chambers Street, 3rd Floor		record.
11	New York, New York 10007	13	A 13 Enfield Drive, East Windsor,
	BY: JOSEPH A. PANTOJA, ESQ.	14	New Jersey 08520.
12			Q Good morning, Ms. Troy. My name
13		15	is Michael Mangan. I'm an attorney who
		16	
14	ALSO PRESENT:	17	represents the plaintiff in this action. I'm
15	WINNIFRIED NOEL CHARLES	18	going to ask you some questions today. If at
16		19	any time you don't understand my question,
17		20	please ask me to rephrase it. I will be very
10		21	happy to do that. But if you don't ask me to
		22	rephrase, I'm going to assume that you
22		23	understand what's meant. Okay?
23		24	A Uh-huh.
24		25	Q Also, if you could please make all
25		age 1 to 4 of	

	Case 1:07-cv-08324-JSR Documen	t 18-	13 Filed 06/04/2008 Page 2 of 6
1	Troy	1	7
	5	2	A I believe see, everything all
2	of your responses verbal. As you can see, we	3	came into one. I was acting for a while and
3	have a court reporter with us today and we	4	then I became the section chief, so it's
4	need to keep a record and she's unable to take	5	probably this was it this February
5	nonverbal responses down. Along the same lines, if you could also please just wait for	6	probably December December of 2007, I
6 	me to finish my complete question before you	7	think. That's not you know, I'm not sure
7	give your answer. In this way, the court	8	of the exact date.
8	reporter will be able to properly transcribe	9	Q And prior to approximately
9	rather than having to try to transcribe people	10	December of 2007, were you the acting section
10	speaking over one another. Okay?	11	chief of the naturalization section?
11 12	A Okay.	12	A I was acting for a couple of
13	Q Finally, if at any time you want	13	months.
14	to take a break, I'm very happy to accommodate	14	Q Would you say approximately
15	you. I just ask that if there's a pending	15	starting in September of 2007?
16	question, before you take a break or speak to	16	A You know, it couldn't be. I was
17	your counsel, if you could just first answer	17	probably probably around November. I can't
18	that question before speaking to counsel.	18	remember the exact dates. I'm sorry.
19	Okay?	19	Q Okay, so that would be November of
20	A Sure, uh-huh.	20	2007? A Seven, yeah. I can't remember the
21	Q Ms. Troy, are you currently	21	A Seven, yeah. I can't remember the exact dates.
22	employed?	22	Q Prior to your assignment as acting
23	A Yes, I am.	23	section chief, what was your position?
24	Q By whom are you employed?	24 25	A I was the site manager for the
25	A USCIS.	25	LEX REPORTING SERVICE
	LEX REPORTING SERVICE		800-608-6085
	800-608-6085	1	Troy
		1 1	
1	Troy 6	'	8
	6	2	naturalization section.
2	Q And that is the United States		naturalization section. Q When were you appointed to that
2 3	Q And that is the United States Citizen and Immigration Service?	2	naturalization section. Q When were you appointed to that position?
2 3 4	Q And that is the United States Citizen and Immigration Service? A Yes, it is.	2 3	naturalization section. Q When were you appointed to that position? A I believe it was the it became
2 3 4 5	Q And that is the United States Citizen and Immigration Service? A Yes, it is. Q Which is a part of The Department	2 3 4	naturalization section. Q When were you appointed to that position? A I believe it was the it became I was acting from November to February
2 3 4 5 6	Q And that is the United States Citizen and Immigration Service? A Yes, it is. Q Which is a part of The Department of Homeland Security, correct?	2 3 4 5	naturalization section. Q When were you appointed to that position? A I believe it was the it became I was acting from November to February November of '0 I was acting for two or
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	Case 1:07-cv-08324-JSR Docume	1109
I	Troy 9	11
	DAO, would you understand what that means?	2 Q Let me ask you first,
		3 approximately how long did that first clerk
3		4 typist position last?
l th	hat point, it was SDAO.	5 A It was about a year.
	Q What does DAO stand for?	6 Q And then you had another clerking
)	A District adjudication officer.	7 position, correct?
7	Q If I use the term DAO, would you	8 A Yes.
s ur	nderstand that to mean district adjudication	a war aither of those two positions
	fficer?	and a direction coction?
0	A Yes.	A where both word
1	Q When were you appointed to the	a with a time your post position?
	position of SDAO?	12 Q What was your next position?
-	A I actually came in in July of 2001	13 A I was a secretary.
3		14 Q When did you first have the
	As SDAO. Q What section was that assignment	15 secretarial position, approximately, if you
5		16 could remember?
	n?	17 A 1978.
7	A In Nats.	18 Q That was also in the
8	Q Nats?	19 naturalization section?
9	A Naturalization.	a war was in adjudications
20	Q Is that an abbreviation of the	a barriage did that position
	naturalization section, Nats?	1
22	A Yes.	22 last?
	Q Since 2001, have you always worked	23 A One year.
23	in the Nats section?	24 Q And what was your next position
	A Yes.	25 after that?
25	LEX REPORTING SERVICE	LEX REPORTING SERVICE
	800-608-6085	800-608 -6 085
		1 Troy
	Troy 10	12
	a annu literary?	2 A Paralegal specialist.
2	Q That is from 2001 until today?	3 Q For how long did that position
3	A That's correct.	
Λ	Q Did you review any documents prior	4 last? 5 A Well, the title has change the
5 t	to testifying today in preparation for today's	and the managed specialist. It
	testimony?	:invation ovaminer and I believe
7	A No.	7 became an immigration examiner, and I beneve
Q	O Did you speak with anybody, other	8 it was until about '85.
0	than your counsel, in preparation for today's	9 Q So from approximately 1979 to
	deposition?	10 1985, you held the position that was
	the same of the sa	11 originally called paralegal specialist and
11		then changed in title to immigration examiner?
	Mr. Pantoja?	13 A Correct.
13	Q Yes.	14 Q Were the duties the same, whether
14	A No.	15 the name of the title was different?
15	Q Between 1990 and 2001, were you	16 A Yes, they were.
16	employed?	and the duties that were
17	A No, I was not.	
12	A Between 1976 and 1990, were you	18 involved?
19	working in the New York District of the CIS?	
	A Yes, I was.	20 section. We were interviewing applicants for
20	Q What was your first position with	21 naturalization.
21	·	22 Q Did you receive any training in
22	the CIS?	23 order to fill that position prior to taking
	A Okay, I started as a clerk typist.	24 the position?
24	Then I was a it was another clerk position.	25 A We first went to training in 1979,
25	I can't remember the exact name.	LEX REPORTING SERVICE
	LEX REPORTING SERVICE	
	800-608-6085	800-608-6085

	Case 1:07-cv-08324-JSR Documen	nt 18	-13 Filed 06/04/2008 Page 4 of 6
1	Troy	1	Troy 15
	13	2	and what's currently called district
2 8	and then again when we were grandfathered into	3	adjudication officer?
	the immigration examiner's position in 1982, I	4	A I wasn't there when the title was
4 t	think.	5	changed. It's the same duties, same thing.
5	Q That was additional training in	6	Immigration examiner and the adjudication
6	1982?	7	officer is the same. They do the same thing,
7	A Right, because the paralegal	8	but I was not there when the title changed. I
8 9	specialist was just training for	9	was that was in between the time I was out.
9 1	naturalization, whereas the immigration	10	Q So by the time you came back to
10	examiner was training for all of	11	the CIS in about 2001, is it your
11	adjudications.	12	understanding that there were no longer
12	Q So did your job change in any way	13	positions titled immigration examiner?
13	between being called a paralegal specialist	14	MR. PANTOJA: Objection.
14	and an immigration examiner?	15	A Guess I haven't seen any. No
4 5	Δ See, my job my job didn't	1	one that I know was called immigration
16	change. I could have been sent to the other	16	examiner.
17	sections. As a paralegal, you only stayed in	17	MR. PANTOJA: Off the
18	naturalization, but as an immigration	18	record.
19	examiner, you were able to go to the other	19	(Whereupon, a discussion was
20	sections, you know, and do adjustment of	20	held off the record.)
21	status and other other applications. But	21	Q We've been talking about the CIS
22	as a paralegal, you only did naturalization.	22	in this deposition and you've been answering
23	But I never moved. I stayed in	23	questions about it.
24	naturalization.	24	A Right.
25	Q Explain to me how that works that	25	LEX REPORTING SERVICE
1	LEX REPORTING SERVICE		800-608-6 0 85
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1	Troy	1	110 y
	14		Q Was the governmental unit that
2	an immigration examiner can work in more than	2	. which you've referred
3	one section, if you know.	3	
4	A If they move if they transfer	4	4075 and 10002
5	you to another section if you get	5	A No. 74 was called the Immigration
6	transferred, I guess.	6	
7	Q But is it the status based upon	7	• And in other words the INS?
8	the training that you have as an immigration	8	A TNC
9	examiner that enabled you to work in more than	9	A Would the INC perform the same
10	one section, if you know?	10	the CIC is now performing to
11	A No.	11	
12	Q You don't know or	12	. A St Mag
13	A I when you get hired no,	13	a set and the town CIS to refer to
14	I don't know. When you get hired, you get	14	by a pietwist that was performing the
15		1!	a maiora hoforo 1990 that you're aware
16	don't	10	a the standard that to also include
17	Q Do you believe that between 1982	1	. Indiana to the total and the
18	and 1985, as an immigration examiner, you	11	A 37
19	could have worked in more than one section?	1	A such as I'm cloar did you
20	MR. PANTOJA: Objection.	2	Now, just so I'm clear, did you
21	A I quess I could have. I'm not	2	
22	the resolved the training for it.	1	from 1979 until approximately 1990?
23		- 1	A No. No.
24	O Is there a difference between the	1	Q What was your next position?
2	2	2	A After I became the well, LEX REPORTING SERVICE
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	Page	13 to 1	6 of 139

	Case 1:07-cv-08324-JSR Documen	t 18-1	3 Filed 06/04 <u>/2008 Page 5 of 6</u>
1	Troy	1	Troy 91
	89	•	Q Has it ever happened to you
2 (copy of the eligibility list showing who is on	2 2 h	
3 t	he list to be promoted, who was requesting a		efore? A If I was asked about someone else?
4 1	promotion?	4	
- 1	MR. PANTOJA: Objection.	5	Q Yes. A Yes, it has. People have asked
	A Everyone would see the list. If	6	A Yes, it has. People have asked ne, but that was for not a supervisory
7 '	you have an opening, the only time you get to	7 m	osition. I was asked I was called by
	see the list or get a copy of the list is if	8 p	nere was one person overseas that was
	you are if you have someone you know, an	9 ti	pplying for a position and they called me and
10	opening in your section. Otherwise, you would	l	pplying for a position and they cance me and
11	not get the list.	1 ' '	sked me about her. Q Did anybody ever ask you about
12	Q So it was unusual for Jimmy Tu to	12	•
12	see the lists for that opening if it wasn't	1	1s. Charles
13 1 <i>4</i>	his section, correct?	14	A No.
	A Right. He didn't get the list.	15	Q when she was applying for
15 46	We just did the interviews with us. I mean,	16 p	positions?
16	the list was with myself and Mr. Bunce, okay,	17	MR. PANTOJA: Objection.
_	because we were the ones conducting the	18	A No.
18	interview. He was just in the interview with	19	Q Did you have any knowledge that
19	us. We had three people doing the interviews.	20 9	she was applying for a position in supervisory
20		21 F	position in 2005 or 2006?
21	as you know that only the persons who are the	22	A None whatsoever.
22	supervisors of the section that has a vacancy	23	Q Did you ever see a list with her
23		24 1	name on it?
24	get to see the list? MR. PANTOJA: Objection.	25	A No, I did not.
25	LEX REPORTING SERVICE		LEX REPORTING SERVICE
	800-608-6085		800-608-6085
, ,	Troy	1	Troy 92
1	90		
	A I'm not no, I don't know if	2	Q When did you first learn that Ms.
2	there's a rule, but there would be no need for	3	Charles had filed any kind of complaint for
3	anyone else to get the list.	1	not being granted a promotion in the CIS? MR. PANTOJA: Objection.
	• Well, would you want to know it,	5	MR. PANTOJA: Objection.
5	for instance, an SDAO who you were supervising	6	A The day I received the complaint.
6	was applying for a promotion in some other	7	Q I'm not talking about the lawsuit.
7	section?	8	I'm talking about whether or not you received
8	MR. PANTOJA: Objection.	9	any information that she had a grievance or an
9	A They normally tell me.	10	internal written complaint with the CIS.
10	Q Your SDAO would tell you that?	11	MR. PANTOJA: Objection.
11	A Yeah.	12	A The day I received the complaint.
12	and the second with that person was	13	Q You're talking about the complaint
13	this for another position with	14	in this action?
14	another section, would it be normal for the	15	A Yes.
15	with the Vacancy TO	16	Q Okay, did Mr. Bunce ever tell you
16	that nerson/	17	that he was participating in an arbitration,
17	NAD DANITOIA: Objection	18	internal arbitration having to do with Ms.
18	A The No not done all the time.	19	Charles' claims?
19	a the second for that to hannen?	20	MR. PANTOJA: Objection.
20	a 7 : ta	21	A No.
21	NAD DANTOIA: Objection	22	Q Did Mr. Bunce I'm sorry?
23	_	23	A I never knew there was one.
1	• • · · · · · · · · · · · · · · · · · ·	24	Q Did Mr. Bunce ever talk to you
24	a — to de lamone	25	about Ms. Charles' grievance or claim?
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1 Troy 93 MR, PANTOJA: Objection. 3 A No. 4 No. G He's never spoken to you about Ms. Charles regarding a grievance or complaint from the beginning of the Earth until today? MR, PANTOJA: Objection. A Right. I didn't know that there was an insue was when 19 to the complaint, and I was kind of surprised because I never knew she an insue was when 19 to the complaint, and I was kind of surprised because I never knew she an insue was when 19 to the complaint, and I was kind of surprised because I never knew she was a man issue was when 19 to the complaint, and I was kind of surprised because I never knew she was a man issue was when 19 to the complaint, and I was kind of surprised because I never knew she was when she applied for the internship. A The only conversation we had was when she applied for the internship. Q What was said then? A We were discussing whether or not we can grant her the six months' leave she was 23 requesting. Q Do you remember what was decided? A I twas decided that we could not LEX REPORTING SERVICE 800-608-6085 I Troy 2 spare her. Q Could not spare her? A Right. Q Do you know if she was actually given the sk-month internship? A She was not. Q What was said between you and Mr. Bunce about that? A We were just looking at who we had. There was a backlog reduction in process. We were losing terms. We were looking employees and we we had a goal. You need to meet that goal and we couldn't afford to lose another person for six months. Q Do you get a goal. You need to meet that goal and we couldn't afford to lose another person for six months. Q Do you got a goal. You need to meet that goal and we couldn't afford to lose another person for six months. Q Do you got a goal. You need to meet that goal and we couldn't afford to lose another person for six months. Q Do you got a goal. You need to meet that goal and we couldn't afford to lose another person for six months. Q Do you got a goal. You need to meet that goal and we couldn't afford to lose another person for six months. Q Do you got a go				40 FU 100/01/000
1 Troy MR. PANTOJA: Objection. A No. Q He's never spoken to you about Ms. Charles regarding a grievance or complaint from the beginning of the Earth until today? R. PANTOJA: Objection. A Right. I didn't know that there was an issue was when I got the complaint, and I was kind of surprised because I never knew she applied for anything. So I don't know of any, okay. Q Did you ever have a conversation when she applied for the internship. When she applied for the internship. Q What was said then? A The only conversation we had was required for the internship. Q What was said then? A The only conversation we had was required for the internship. Q What was said then? A Twas decided that we could not LEX REPORTING SERVICE 800-080-605 1 Troy Q spare her. 3 Q Could not spare her? 4 A Right. 5 Q Do you know if she was actually given the stx-month internship? 7 A She was not. 10 Troy Q spare her. 3 Q Could not spare her? 4 A Right. 5 Q Do you know if she was actually given the stx-month internship? 7 A She was not. 10 When about that? 11 Troy Q spare her. 12 Q When about was that, if you remember? 13 Q When about was that, if you remember? 14 A Well— 15 A Well— 16 MR. PANTOJA: Objection. 17 A She was and then? 18 A She was senior thirteen. She was encounted the summer of the summer. 19 Q what was said there was a backlog reduction in process. We were losing terms. We were losing employees and we — we had a goal. 19 Q when was about was that, if you remember? 10 A Just before she left. I believe it was 2006 - summer of 2006, I believe, or it was 2006 - summer of 2006, I believe, or it was 2006 - summer of 2006, I believe, or it was 2006 - summer of 2006, I believe, or it was 2006 - summer of 2006, I believe, or it was 2006 - summer of 2006, I believe, or it was 2006 - summer of 2006, I believe, or it was 2006 - summer of 2006, I believe, or it was 2006 - summer of 2006, I believe, or it was 2006 - summer of 2006, I believe, or it was 2006 - summer of 2006, I believe, or it was 2006 - summer of 2006, I believe, or it was				-13 Filed 06/04/2008 Page 6 of 6 Troy
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3 A No. 4 Q He's never spoken to you about Ms. 5 Charles regarding a grievance or complaint from the beginning of the Earth until today? 6 MR. PANTOJA: Objection. 7 A Right. I didn't know that there was a manage was when I got the complaint, and I was kind of surprised because I never knew she applied for anything. So I don't know of any, okay. 7 O Did you ever have a conversation with Mr. Bunce about Ms. Charles? 8 MR. PANTOJA: Objection. 9 A The only conversation we had was when she applied for the internship. 9 Q What was said then? 10 A We were discussing whether or not we can grant her the six months' leave she was requesting. 11 Troy 12 A We were discussing whether or not LEX REPORTING SERVICE 800-608-6085 11 Troy 12 Spare her. 13 Q Could not spare her? 14 A Right. 15 Q Do you know if she was actually given the six-month internship? 16 A Just before she left. I believe or just before the summer. 17 A A She was a backlog reduction in process. We were losting terms. We were losting the manager, were short a supervisor, so we had her as: a clark year, you get a goal. You need to meet that goal and we couldn't afford to lose another person for six months. 18 A Well— 19 C Q What was said between you and Mr. Bunce about that; if you remember? 10 A Just before she left. I believe or just before the summer. 11 Q What was said between you and Mr. Bunce about that; if you remember? 12 A Well— 13 C Q What was said between you and Mr. Bunce about that; if you remember? 14 A Robut four or five mentor, to train, to assist new employees, okay. Jessi Clark is one of them, but since we were shid that happen, approximately? 15 A Well— 16 A Well— 17 C C C Well and the provided in the neaturalization section, or section been promoted to spot to a fit was before she left. I believe or the summer of 2006, I believe, or just before the summer. 13 G What was said between you and Mr. Bunce about that; if you remember what was a decided? 14 A Well— 15 C Q C What was said between you and Mr. Bunce about that; if you remember what w			2	· · · · · · · · · · · · · · · · · · ·
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A He's never spoken to you about Ms. 5 Charles regarding a grievance or complaint 6 from the beginning of the Earth until today? 7 M. R. PANTOJA: Objection. 8 A Right. I didn't know that there 9 was the only time I learned that there was an issue was when I pot the complaint, and I 11 was kind of surprised because I never knew she applied for anything. So I don't know of any, okay. 12 Q. Did you ever have a conversation 13 with Mr. Bunce about Ms. Charles? 14 Q. Did you ever have a conversation 15 MR. PANTOJA: Objection. 16 MR. PANTOJA: Objection. 17 A The only conversation we had was 18 when she applied for the internship. 19 Q. What was said ther? 10 MR. PANTOJA: Objection. 11 Troy 12 Spare her. 13 Q. Do you remember what was decided? 14 A Right. 15 Q. Do you know if she was actually 16 given the sk-month internship? 17 A She was son. 18 Q. What was said between you and 19 MR. Bunce about that? 10 A Well 11 Troy 10 A Just before she left. I believe 11 It was 2006 summer of 2006, I believe, or 12 just before the summer. 13 Q. What was said between you and 14 Mr. Bunce about that? 15 A Well 16 MR. PANTOJA: Objection. 17 A Well 18 the naturalization section been promoted to 18 the naturalization section been promoted to 19 SDAO? 2 Id not believe so. There was 10 A Idon't believe so. There was 11 the naturalization section been promoted to 12 two I can think of, but I'm not sure when 13 if it was before she left. 14 I'm not good on dates. 15 Q how about Jessica Clark, has she 16 been promoted from a position of DAO and 17 naturalization? 18 A She was senior thirteen and she's been 18 promoted to senior thirteen and she's been 18 promoted to senior thirteen and she's been 19 process. 10 A She was senior thirteen and she's been 20 position of DAO and 21 A No. She's a GSI3? 22 Q Do you know if she was actually 23 given the sk-month internship? 24 A Right. 25 Q So she's a GSI3? 26 Do you know if she was actually 27 A She was senior thirteen and she's been 28 promoted to senior thirteen and she's bee		A No.		
5 Charles regarding a grievance or complaint from the beginning of the Earth until today? 7 MR. PANTOJA: Objection. 8 A Right. I didn't know that there was an sissue was when I got the complaint, and I was kind of surprised because I never knew she applied for anything. So I don't know of any, okay. 10 Was kind of surprised because I never knew she applied for anything. So I don't know of any, okay. 11 Was kind of surprised because I never knew she applied for anything. So I don't know of any, okay. 12 Q Did you ever have a conversation with Mr. Bunce about Ms. Charles? 13 MR. PANTOJA: Objection. 14 A The only conversation we had was when she applied for the internship. 15 Was kind of surprised because I never knew she was requesting. 16 MR. PANTOJA: Objection. 17 A We were discussing whether or not we can grant her the six months' leave she was requesting. 18 A She was senior thirteen and she's been acting or us for a couple of months because we were short a supervisor. 19 Q Do you know if she was actually given the six-month internship? 10 A Just before she left. I believe it it was 2006 – summer of 2006, I believe, or just before the summer. 10 Q What was said between you and Mr. Bunce about that? 11 If was 2006 – summer of 2006, I believe, or just before the summer. 12 Q When about was that, if you remember? 13 A Well — 14 Mr. Bunce about hat? 15 A Well — 16 MR. PANTOJA: Objection. 17 A We were just looking at who we had a goal. 18 Mr. Bance about that? 19 A We were losing terms. We were losing employees and we — we had a goal. 19 Early and the six-month internship? 10 A We were losing terms. We were losing employees and we — we had a goal. 11 Early and the six months. 12 Q Do you remember when it was that any promoted to senior thirteen and she's been acting as an SDAQ LEX REPORTING SERVICE 19 Section view of a couple of months because we were she's a supervisor. 10 Q What was said been and DaO in the naturalization section, correct? 11 It was 2006 – summer of 2006, I believe,	4	Q He's never spoken to you about Ms.	•	
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9 was the only time I learned that there was an issue was when I got the complaint, and I was kind of surprised because I never knew she applied for anything. So I don't know of any, 3 okay. 10	R	A Right, I didn't know that there		
10 an issue was when I got the complaint, and I was kind of surprised because I never knew she applied for anything. So I don't know of any, olday. 11	۵ ،	was the only time I learned that there was	_	
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800-608-6085 Page 93 to 96 of 139	<u></u>	Page 93	3 to 9	6 of 139 24 of 47 s